

**Exhibit A**  
**Emails Confirming July 12 Deposition**

## Suzanne Elovecky

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**From:** Kate Klaus <KKlaus@maddinhauser.com>  
**Sent:** Tuesday, July 11, 2023 1:48 PM  
**To:** Suzanne Elovecky; mb@canonicalaid.org; balestrieri.marc@gmail.com  
**Subject:** [EXTERNAL] RE: de Laire v. Voris, et al/July 12, 2023 Deposition

The parties and their counsel will be traveling at significant expense to attend the deposition. If you're not going to appear, please so advise. Both parties may be entitled to sanctions for costs and attorneys' fees incurred in connection with the deposition, if you do not appear.

### Kate Klaus

Shareholder



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Receptionist (248) 354-4030

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kklaus@maddinhauser.com  
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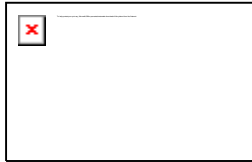
**From:** Suzanne Elovecky <selovecky@psh.com>  
**Sent:** Monday, July 10, 2023 5:47 PM  
**To:** Kate Klaus <KKlaus@maddinhauser.com>; mb@canonicalaid.org; balestrieri.marc@gmail.com  
**Subject:** Re: de Laire v. Voris, et al/July 12, 2023 Deposition

[EXTERNAL EMAIL]  
Mr. Balestrieri:

I am writing to confirm your deposition on this Wednesday, July 12, 2023. We have heard nothing from you, or counsel, concerning a need to move the date, and we are therefore proceeding as set forth in our agreement which has been entered on the court docket. As agreed, we are slated to begin at 8 am at my office at 30 Federal Street, 7th floor, Boston, MA. If you need to reach me you may at 617-283-9152.

Thank you. And I will see you Wednesday.

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[Learn more about our lawyers at psh.com](https://www.psh.com)



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**From:** Kate Klaus <[KKlaus@maddinhauser.com](mailto:KKlaus@maddinhauser.com)>

**Sent:** Wednesday, July 5, 2023 1:44:46 PM

**To:** [mb@canonicalaid.org](mailto:mb@canonicalaid.org) <[mb@canonicalaid.org](mailto:mb@canonicalaid.org)>; [balestrieri.marc@gmail.com](mailto:balestrieri.marc@gmail.com) <[balestrieri.marc@gmail.com](mailto:balestrieri.marc@gmail.com)>

**Cc:** Suzanne Elovecky <[selovecky@psh.com](mailto:selovecky@psh.com)>

**Subject:** [EXTERNAL] de Laire v. Voris, et al/July 12, 2023 Deposition

Marc –

As you know, you agreed to appear at the Boston offices of Partridge, Snow and Hahn for your deposition on **July 12, 2023** starting at 8:00 a.m. Please confirm that you will appear.

Thanks,

Kate

**Kate Klaus**

Shareholder



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